

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

SAMUEL BANKMAN-FRIED,

Defendant.  
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S6 22 Cr. 673 (LAK)

**DECLARATION OF CHRISTIAN R. EVERDELL IN SUPPORT OF DEFENDANT  
SAMUEL BANKMAN-FRIED'S MOTIONS *IN LIMINE***

I, Christian R. Everdell, an attorney duly admitted to practice before this Court hereby declare pursuant to 28 U.S.C. § 1746 and Local Criminal Rule 16.1 as follows:

1. I am a partner of the law firm Cohen & Gresser LLP, attorneys for Defendant Samuel Bankman-Fried.
2. Attached as Exhibit A is a true and correct copy of ECF 153, Mr. Bankman-Fried's letter to the Court regarding the status of the Government's discovery productions, dated June 5, 2023.
3. Attached as Exhibit B are true and correct copies of excerpts from the transcript of the April 12, 2023 hearing in *In re FTX Trading Ltd.*, No. 22-11068 (JTD), in the United States Bankruptcy Court District of Delaware.
4. Attached as Exhibit C is a true and correct copy of Signal messages between Zach Dexter and another individual, dated November 10, 2022, bearing Bates numbers SDNY\_02\_00411761 through SDNY\_02\_00411764.

5. Attached as Exhibit D is a true and correct copy of Signal messages between Zach Dexter and other FTX personnel, dated November 11, 2022, bearing Bates numbers SDNY\_02\_00412000 through SDNY\_02\_00412002.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

Dated: August 14, 2023  
New York, New York

Respectfully submitted,

/s/ Christian R. Everdell  
Christian R. Everdell  
**COHEN & GRESSER LLP**  
800 Third Avenue, 21<sup>st</sup> Floor  
New York, NY 10022  
(212) 957-7600  
ceverdell@cohengresser.com

*Attorneys for Samuel Bankman-Fried*